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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 24-cr-403-AMO
	)	
Plaintiff,	)	<b>STIPULATION AND [PROPOSED] ORDER</b>
	)	<b>RE: RESTITUTION</b>
v.	)	
	)	
CARRIE LYNN GRANT,	)	
	)	
Defendant.	)	

The United States and defendant Carrie Lynn Grant (“Defendant”), by and through their counsel of record, hereby stipulate as follows:

1. On August 11, 2025, Defendant pleaded guilty to wire fraud in violation of 18 U.S.C. § 1343.

2. On December 8, 2025, the Court sentenced Ms. Grant to 27 months imprisonment to be followed by 3 years of supervised release. The Court ordered Ms. Grant to pay restitution in an amount to be determined at a later restitution hearing, and set a status conference on restitution for January 26, 2026. The parties have reached an agreement on restitution, which is outlined below.

3. Restitution is mandatory to victims of fraud pursuant to 18 U.S.C. § 3663A (MVRA). Specifically, the law provides that a court “shall order . . . restitution” and that this restitution order

1 “shall order restitution to each victim” through the appropriate court mechanism “in the full amount of  
2 the victim’s losses as determined by the court and without consideration of the economic circumstances  
3 of the defendant.” 18 U.S.C. § 3664(f)(1)(A).

4 4. To conserve judicial resources, to bring about a speedy resolution of this matter, and to  
5 avoid further litigation, the parties agree and jointly request that the Court, upon approval of this  
6 Stipulation, may enter a Judgment to order restitution to the entities in the amounts as set forth below:

7 a. \$1,671,218.08 in total to Charity 1;<sup>1</sup>

8 The parties stipulate that the above entities qualify as “victims” under the statutes cited in paragraph 3,  
9 *supra*, and are entitled to restitution under 18 U.S.C. § 3663A(a)(3). The United States shall furnish the  
10 Clerk’s Office with physical address information for each entity.

11 5. The parties agree that the full amount of special assessment, fine, and restitution is due  
12 immediately in accordance with 18 U.S.C. § 3572(d).

13 6. The restitution payment shall be made payable to the Clerk of U.S. District Court,  
14 Attention: Finance Unit, 450 Golden Gate Ave., Box 36060, San Francisco, CA 94102, or via pay.gov.

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28 <sup>1</sup> This restitution amount is the result of an agreement between the parties to this matter and is  
not binding on the victim in any other proceedings regarding the amount of loss attributable to Ms.  
Grant’s conduct.

1           7.       The parties request that the Court issue a Judgment ordering restitution payable to the  
2 entities identified and the terms outlined above.

3                               SO STIPULATED.

4 DATED: December 19, 2025

5                               CRAIG H. MISSAKIAN  
6                               United States Attorney

7                               \_\_\_\_\_/s/\_\_\_\_\_  
8                               EVAN M. MATEER  
9                               Assistant United States Attorney

10 DATED: December 19, 2025

11                               JODI H. LINKER  
12                               Federal Public Defender

13                               \_\_\_\_\_/s/\_\_\_\_\_  
14                               ELISSE LAROCHE  
15                               Attorney for Defendant Carrie Lynn Grant

**[PROPOSED] ORDER**

Carrie Lynn Grant will pay a total of \$ 1,671,218.08 in restitution, in the amounts specified to the entities specified as follows:

a. \$1,671,218.08 in total to Charity 1;

The above entities qualify as victims pursuant to 18 U.S.C. § 3663A(a)(3).

The full amount of special assessment, fine, and restitution is due immediately. During imprisonment, payment of criminal monetary penalties is due at the rate of not less than \$25 per quarter and payment shall be through the Bureau of Prisons' Inmate Financial Responsibility Program. Once Defendant is on supervised release, Defendant shall pay restitution in monthly payments of not less than \$100 or at least 10% of earnings, whichever is greater, to commence no later than 60 days from placement on supervision.

Notwithstanding any payment schedule set by the court, the United States Attorney's Office may pursue collection through all available means in accordance with 18 U.S.C. §§ 3613 and 3664(m). The criminal monetary penalty payments shall be made to the Clerk of U.S. District Court, Attention: Finance Unit, 450 Golden Gate Ave., Box 36060, San Francisco, CA 94102.

The Probation Office shall prepare an amended judgment in accordance with this order. The hearing originally set for January 26, 2025 is hereby vacated.

IT IS SO ORDERED.

DATE:

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HON. ARACELI MARTÍNEZ-OLGUÍN  
UNITED STATES DISTRICT JUDGE